



Shimshon Wexler <swexleresq@gmail.com>

RE: Discovery Responses- Cordtz v Johnson et al NDGA

1 message

Mark A. Baker <mbaker@mtglaw.com>

Thu, Oct 14, 2021 at 9:57 AM

To: Shimshon Wexler <swexleresq@gmail.com>

Cc: Larry Johnson <ljohnson@suretybondsagency.com>, "Gregory J. Sanda" <GSanda@mtglaw.com>, "Mark A. Baker" <mbaker@mtglaw.com>

1. J Taylor Law was January Taylor's law firm prior to forming McMichael Taylor Gray, LLC in approximately 03/2018. The formation is reflected on the Georgia Secretary of State's website and the documents associated therewith: <https://ecorp.sos.ga.gov/BusinessSearch/BusinessInformation?businessId=2483690&businessType=Domestic%20Limited%20Liability%20Company&fromSearch=True>
2. There is no written contract between either J Taylor Law, LLC or McMichael Taylor Gray, LLC and the Aspen entity.
3. There is no written contract between either J Taylor Law, LLC or McMichael Taylor Gray, LLC and Larry W. Johnson or Johnson Legal Offices, LLC.

**Mark A. Baker**

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mbaker@mtglaw.com**From:** Shimshon Wexler <swexleresq@gmail.com>**Sent:** Thursday, October 14, 2021 8:49 AM**To:** Mark A. Baker <mbaker@mtglaw.com>**Cc:** Larry Johnson <ljohnson@suretybondsagency.com>; Gregory J. Sanda <GSanda@mtglaw.com>**Subject:** Re: Discovery Responses- Cordtz v Johnson et al NDGA

Thank you Mr. Baker. I am in receipt of the production and I had a few questions.

1-Because this is the first I'm ever hearing of J Taylor Law, LLC ("J Taylor") and because Johnson did not mention J Taylor and only mentioned the McMichael Taylor Gray, LLC ("McMichael") law firm, can you please tell me the relationship, understanding or agreement (the "contract") between J Taylor and McMichael while producing a copy of the writing which the relationship, understanding, contract or agreement was reduced to.

2-Can you please confirm that there is no contract between the alleged owner of Plaintiff's account (the Aspen entity) on the one hand and J Taylor Law or McMichael on the other. And if there is a contract, please produce the contract.

3- Can you please confirm that there is no contract between J Tolor or McMichael on the one hand and Larry W. Johnson or Johnson Legal Offices, LLC on the other hand. And if there is a contract, please produce it.

I look forward to your response. Please let me know if you have any questions or concerns.

Thank you,

Shimshon

212-760-2400

On Wed, Oct 13, 2021 at 5:38 PM Mark A. Baker <mbaker@mtglaw.com> wrote:

Mr. Wexler,

In connection with the deposition of McMichael Taylor Gray, LLC scheduled Monday, 10/18/21 at 10 a.m. ET, attached are all documents the firm has that are responsive to your production request.

As this deposition will be via Zoom or similar, we will not cash your witness appearance fee check. May we have the same courtesy regarding Mr. Cordtz's Zoom deposition?